

Madera Ranch Project Oversight Committee

12152 Road 28 1/4
Madera, CA 93637
(209) 673-3514

September 8, 1998

Roger K. Patterson
Regional Director, Mid-Pacific Region
U.S. Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825

Dear Mr. Patterson:

The Madera Ranch Project Oversight Committee represents concerned and potentially impacted water agencies and landowners who operate agricultural concerns in proximity to the proposed Madera Ranch Groundwater Bank. Our 12 member Committee is comprised of two representatives from each of the following: Aliso Water District (located in Madera County representing 24,000 acres), Chowchilla Water District (located in Madera County representing 78,000 acres), Gravelly Ford Water District (located in Madera County representing 10,000 acres), Madera Irrigation Water District (located in Madera County representing 130,000 acres), San Luis Delta-Mendota Water Authority (located in five counties representing 1,200,000 acres and 32 water agencies) and Unincorporated Growers (located in Madera County representing 28,000 acres).

The Committee's purpose is to protect overlying landowners' rights to groundwater, to protect the quality of the native or indigenous groundwater resource, to safeguard the use of groundwater, surface water and surface water facilities for agricultural purposes and to protect the quality of water in the groundwater basin and in the receiving water of the Central Valley Project. Our objective is to evaluate the proposed Madera Ranch Underground Water Storage Project (Project), determine the feasibility and impacts of the Project as it relates to surrounding landowners, city residents and the County of Madera and develop local governance policies should the project progress.

As of this date, the Committee has grave concerns regarding the feasibility and rate of progress of the Project and we have many questions/issues which have thus far gone unanswered. Specifically, but not limited to:

Determination of Technical Feasibility Within Project Definition Structure

During Phase 1 of the project, the Bureau of Reclamation (BR) analyzed the technical feasibility at an appraisal level (Phase 1 Report, page 7) utilizing geohydrologic data provided by Bookman-Edmonston (Phase 1 Report, page 9).

We believe the appraisal level modeling the BR conducted during Phase 1 is **NOT ADEQUATE** to commence some of the Phase 2 activities identified in the Phase 1 Report. Until the BR has conducted adequate site-specific investigations and fully evaluated technical feasibility at a higher level we believe it is unreasonable and imprudent to seek congressional authorizations, negotiate agreements or commence the permit application process to implement a groundwater bank. We are concerned that conducting this project in this fast-track manner will lead to erroneous and damaging decisions. Lastly, the Phase 1 Report lacks a detailed list of Phase 2 activities.

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Lack of Environmental Impact Study (EIR)

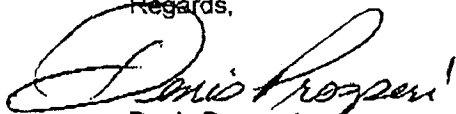
The list of project tasks does not include the completion of an EIR. For a project of this magnitude and potential change in our aquifer, we believe it is **mandatory** to conduct an EIR during Phase 2 **ONLY AFTER** a demonstration of a higher level of technical feasibility. This will provide a process for potentially impacted parties to comment.

Lack of Stated Plan for Local Governance in Project

The Phase I Report notes that local concerns exist, but only vaguely states these "issues will be explored if BR decides to move forward to Phase 2". We request a formal activity for evaluation and review of the Project by our Committee in Phase 2. Furthermore, we will require that local governance policies and an acceptable operation plan be developed and incorporated within Phase 2.

Please don't confuse the brevity of our comments with our level of concern. We would like to meet with you at your earliest convenience regarding our concerns. Thank you for your prompt attention to this matter.

Regards,



Denis Prosperi
Chairman, Madera Ranch Project Oversight Committee
906-1100 cellular
(209) 673-3921 home/office

cc: Pete Wilson, Governor
Bill Jones, California Secretary of State
Barbara Boxer, U.S. Senator
Dianne Feinstein, U.S. Senator
Newt Gingrich, Speaker of the U.S. House of Representatives
Gary Condit, U.S. Congressman
Cal Dooley, U.S. Congressman
George Radanovich, U.S. Congressman
Bill Thomas, U.S. Congressman
Jim Costa, California State Senator
Dick Monteith, California State Senator
Dennis Cardoza, California State Assemblyman
George House, California State Assemblyman
Robert Prenter, California State Assemblyman
Michael Spear, U.S. Dept of Fish and Wildlife
Lester Snow, CALFED
Madera County Board of Supervisors
Madera City Council
Chowchilla City Council
Jason Peltier, Central Valley Project Water Association
Dick Moss, Friant Water Users' Authority
California State Farm Bureau
Farm Bureau, Counties of Madera, Fresno, Merced, Santa Clara, San Benito,
Stanislaus, and San Joaquin